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September 17, 2007

## BY ELECTRONIC FILING (ECF) AND HAND DELIVERY

The Honorable Noel L. Hillman United States District Court for the District of New Jersey Mitchell H. Cohen U.S. Courthouse 1 John F. Gerry Plaza, Room 6020 Camden, NJ 08101

Re:

In re Pet Food Products Liability Litigation,

MDL Docket No. 1850

## Dear Judge Hillman:

We jointly present this letter on behalf of: the proposed lead counsel group comprised of Wexler Toriseva Wallace LLP, Berger & Montague, P.C., Couglin Stoia Geller Rudman & Robbins LLP, Hagens Berman Sobol Shapiro LLP and affiliated counsel; and the proposed lead counsel group comprised of Audet & Partners, LLP, Kamber & Associates, LLC, Blim & Edelson, LLC and affiliated counsel.

First, we are pleased to report to the Court the status of on-going discussions regarding mediation. A number of dates between now and the end of the year have been reserved for mediation before Professor Eric D.Green, a Principal of Resolutions LLC located in Boston, Massachusetts.

Second, in accordance with paragraph 20 of the Practice and Procedure Order Upon Transfer Pursuant to 28 U.S.C. Section 1407(a), entered August 14, 2007, the following items are proposed to be included on the agenda for the conference on September 26, 2007, before Your

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Honor, in addition to: (1) a formal hearing on the three motions for appointment of lead and liaison counsel; and (2) Your Honor's August 28, 2007 Order to Show Cause why Menu Foods should not be granted leave to settle with certain designated members of the putative class:

- 1. Scheduled Mediation
- 2. Entry of Evidence, Document and Electronic Material Preservation Order
- 3. Confidentiality Order
- 4. Timing of Filing of Consolidated Amended Complaint and any Responses Thereto
- 5. Stay of Proceedings
- 6. Further Status Conferences

Counsel considered filing a detailed scheduling submission, but thought this list of topics was more consistent with the Court's instruction and that a detailed submission at this time was premature in light of the pending mediation.

We look forward to appearing before Your Honor on September 26, 2007 at 11:00 a.m.

DATED: September 17, 2007

Respectfully submitted,

## TRUJILLO RODRIGUEZ & RICHARDS LLC

By: /s Lisa J. Rodriguez

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